

FILED

SEP 10 2020

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

UNITED STATES OF AMERICA,) Case No. **20 CR 186 JED**
)
Plaintiff,) **INDICTMENT**
) [COUNT 1: 18 U.S.C. §§ 1151, 1153,
v.) 1111, and 2 — First Degree in Indian
) Country Felony - Murder
KELSEY DAWN LIPP,) COUNT 2: 18 U.S.C. §§ 1151, 1153,
) 2111, and 2 – Robbery in Indian
Defendant.) Country]

THE GRAND JURY CHARGES:

COUNT ONE
[18 U.S.C. §§ 1151, 1153, 1111, and 2]

On or about July 25, 2018, within Indian Country in the Northern District of Oklahoma, the defendant, **KELSEY DAWN LIPP**, an Indian female, caused the unlawful killing of Dustin Michael Barham with malice aforethought, in that she aided, abetted, counseled, induced, commanded, and procured others known to the Grand Jury to rob Dustin Michael Barham and, during the commission of the robbery, the others killed Dustin Michael Barham by shooting him.

All in violation of Title 18, United States Code, Sections 1151, 1153, 1111, and 2.

COUNT TWO
[18 U.S.C. §§ 1151, 1153, 2111, and 2]

On or about July 25, 2018, within Indian Country in the Northern District of Oklahoma, the defendant, **KELSEY DAWN LIPP**, an Indian female, aided, abetted, counseled, induced, commanded, and procured others known to the Grand Jury to take money from the person and presence of Dustin Michael Barham, by force and violence, and by intimidation.

All in violation of Title 18, United States Code, Sections 1151, 1153, 2111, and 2.

R. TRENT SHORES
UNITED STATES ATTORNEY

A TRUE BILL


Joel-lyn A. McCormick
Assistant United States Attorney

/s/ Grand Jury Foreperson
Grand Jury Foreperson